

STONE MAGNANINI

COMPLEX LITIGATION

December 9, 2021

VIA ECF

Honorable Michael A. Hammer
United States District Court
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Jobadiah Sinclair Weeks*, Crim. No. 19-cr-877

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion, on behalf of defendant Jobadiah Weeks. We respectfully move to modify his bail conditions to allow Mr. Weeks to travel within the state of Colorado over the holidays, to spend time alone with his wife Stephanie Weeks in the family condo. The Court's Order Setting Conditions of Release restrict Mr. Weeks travel to "New Jersey" and "Colorado". The Conditions also requires Mr. Weeks to remain in his residence under home incarceration and under the "supervision" of third party custodians. Stephanie Weeks is a third party custodian and Mr. Weeks will be in her presence at all times. Mr. Weeks has fully complied with all conditions of his release since he was last before the court and no issues have been raised by Pretrial Services with respect to his compliance.

The proposed modifications to the courts order would be under the following conditions:

- Detailed travel itineraries shall be provided to Pretrial Services for review and approval in advance of any travel.
- Mr. Weeks shall remain in the presence of his wife and third party custodian, Stephanie Weeks, during travel and throughout the trip.

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- Mr. Weeks will continue to wear his GPS device at all times and will comply with all other bail conditions.
- Any travel involved shall be by automobile and shall not be outside of the state of Colorado.

We have discussed this proposal with both the US attorney and Pretrial Services, it's our understanding that the US attorney defers to Pretrial Services. Pretrial Services has advised that while Mr. Weeks has complied with all conditions of release, since we were last before the court, it objects because it interprets the term "house incarceration" to preclude this travel. Accordingly we are writing to the courts to request this modification to previous conditions.

Respectfully submitted,



David S. Stone
Senior Managing Partner

Cc: Anthony P. Torntore, AUSA (via ECF & E-mail)
Matthew Schwartz, Esq. (via ECF & E-mail)
U.S. Pretrial Services Officer, David E. Hernandez (via E-mail)